

EXHIBIT A

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UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH, individually
and as Parent and legal guardian
of WW, KW, GW and SW, minor
children of MATTHEW WADSWORTH,
Plaintiffs, Case No.
2:23-cv-00118-NDF

vs.
WALMART, INC., and JETSON ELECTRIC
BIKES, LLC,

Defendants.

VIDEO-RECORDED DEPOSITION OF:
CORPORATE REPRESENTATIVE OF
JETSON ELECTRIC BIKES

SAM HUSAIN

TAKEN AT: McCOY, LEAVITT, LASKEY LAW
LOCATED AT: N19 W24200 Riverwood Drive
Waukesha, Wisconsin

May 17, 2024

9:36 a.m. to 2:11 p.m.

REPORTED BY: VICKY L. ST. GEORGE, RMR.

JOB NO. 6646833

1 Q. Has this product ever failed a UL certification or
2 recertification?

3 A. Not to my knowledge.

4 Q. When did UL certification 2272, when was that
5 implemented?

6 A. This is completely going off --

7 Q. If you know.

8 MR. LAFLAMME: Just as a point of
9 clarification, are you talking about the standard in
10 general?

11 MR. AYALA: Yes.

12 MR. LAFLAMME: Okay.

13 THE WITNESS: Going completely off of my
14 memory, I believe it was 2015 or 2016, 2015 or 2016.

15 BY MR. AYALA:

16 Q. Do you know the reasons why that standard was
17 implemented?

18 A. I don't know the specifics.

19 (Exhibit 54 marked.)

20 BY MR. AYALA:

21 Q. Exhibit 54 is titled CPSC safety alert, it's the
22 Consumer Product Safety Commission safety alert
23 relating to Hoverboards.

24 First, are you familiar with the Consumer
25 Product Safety Commission?

1 A. Yes, I am.

2 Q. Are you involved in communicating with that safety
3 commission relating to Jetson products?

4 A. No. It's done through our CPSC counsel.

5 Q. Is Jetson, is Jetson required to abide by any CPSC
6 standards or requirements?

7 A. I would consult with my CPSC counsel on that.

8 Q. And who is that?

9 A. Rick Locker.

10 Q. Where is he located?

11 A. New York.

12 Q. Does he work out of the Jetson office?

13 A. No.

14 Q. In looking at this CPSC safety alert, it describes
15 dangers posed by Hoverboards according to their
16 terminology, and it states that CPSC is aware of more
17 than 250 self-balancing scooter/Hoverboard incidents
18 related to fires or overheating, and it describes an
19 incidence in March of 2017 where a two-year-old girl
20 and a 10-year-old girl died in a house fire ignited
21 by a Hoverboard in Harrisburg, Pennsylvania.

22 Do you see that?

23 A. I do see that here.

24 Q. It also talks about reports of 13 burn injuries,
25 three smoke inhalation injuries and more than \$4

1 million dollars in property damage related to
2 Hoverboards, do you see that?

3 A. Yes.

4 Q. And pursuant to that initial advisory CPSC gives
5 recommendations to consumers, do you see that?

6 A. Yes.

7 Q. And in these recommendations it also discusses this
8 UL 2272 safety standard, do you see that?

9 A. Yes, I do.

10 Q. This last bullet point in the middle section states
11 "Hoverboards should be compliant with the UL 2272
12 safety standard."

13 Obviously this safety alert describes an
14 event from March of 2017, but is it your recollection
15 that the UL 2272 safety standard would have been
16 implemented in and about that timeframe of 2017?

17 A. Yes.

18 Q. That last bullet point goes on to state "however,
19 even UL 2272 compliance cannot guarantee that a
20 Hoverboard will not overheat or catch fire."

21 Do you see that?

22 A. Yes.

23 Q. Do you agree with that?

24 MR. LAFLAMME: Object to form.

25 THE WITNESS: Agree with what? Sorry.

1 BY MR. AYALA:

2 Q. That even UL 2272 compliance cannot guarantee that a
3 Hoverboard will not overheat or catch fire.

4 MR. LAFLAMME: Object to form.

5 THE WITNESS: Yes.

6 BY MR. AYALA:

7 Q. In fact, you, meaning Jetson, acknowledges and
8 appreciates that even some of its Hoverboards with UL
9 certification or recertification have in fact caught
10 on fire, correct?

11 MR. LAFLAMME: Object to form. Go ahead.

12 THE WITNESS: Can you say that again?

13 Sorry.

14 MR. AYALA: Yes, sir.

15 BY MR. AYALA:

16 Q. Jetson agrees and acknowledges that some of its
17 Hoverboards even with UL certification 2272 have
18 caught on fire?

19 MR. LAFLAMME: Object to form.

20 THE WITNESS: I would not agree, but I
21 would acknowledge that Hoverboards, depending on the
22 circumstances and the use and the conditions, have
23 had a thermal event.

24 BY MR. AYALA:

25 Q. So what part of my question do you not agree with?